

extended period) the aircraft should undergo 100 hour inspections by either an A & P certificate holder or a repairman holding a maintenance rating.

4. The 87 knot maximum velocity for student Sport Pilots should be eliminated [SFAR 89, Sections 35(e), 65, 73, 83, and 121-(3)(iv), Section 135(c)]. As written, this would require flight schools to provide two different sets of aircraft for training and rental. Doing so might prove a financial burden for the industry, possibly even impacting its participation in the Sport Pilot training program.

5. Light sport aircraft should only be required to have 3 inch numbers [FAR 45.29]. Many current aircraft eligible for certification as light sport aircraft do not have sufficient side area to permit display of 12 inch numbers. These aircraft will only be operated in the United States...larger numbers just aren't necessary.

6. The night operation requirements [FAR 61.107 (b), 9(ix) and 10 (ix)] for private pilot certification in powered parachutes and weight aircraft should be eliminated. I can't imagine flying such equipment at night. The hazard to persons and property would far outweigh any possible utility.

I believe these changes would positively affect safety, allow the industry to participate fully, and make the proposed rule as user friendly as possible. Thank you for allowing me to comment on this NPRM.

Sincerely,

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2 of 2

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167122

From: haulenbe@flash.net
Sent: Sunday, May 05, 2002 5:25 PM
To: govt@eaa.org
Subject: Comments to NPRM No. FAA-2001-11133, Certification of Pilots, Aircraft and Repairmen for the Operation of Light Sport Aircraft

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DEPT OF TRANSPORTATION
02 MAY -6 PM 12:26

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Aviation Background: I first started flying in 1961. I received my Private pilot certificate in 1963. In 1969 I earned both flight and ground instructor certificates. I currently hold a commercial pilot certificate with airplane single and multi-engine land ratings plus instrument airplane, an advanced and instrument ground instructor certificate, and a flight instructor certificate for airplane single engine land. I am a retired FAA Air Traffic Control Specialist. I worked in both the terminal and flight service options. I have over 3100 hours of flying time and in excess of 1700 hours of dual given. All but 50 hours of my flying time has been in single engine aircraft. I have flown 99 different aircraft types. I am a gold seal instructor and hold a MCPI.

Comments: Dear Sirs,

I would like to comment on the Sport Pilot NPRM. I think that this proposal is well thought out, well written, and generably acceptable. The FAA team that generated this document should be commended for their efforts.

Before issuance of the final rule, I would like to suggest some modest changes, as follows:

1. Lets revise the gross weight limitation [FAR Part 1] from 1232 to 1300 pounds. This would allow a wider variety of engines and would not restrict the industry to light weight engines two cycle engines. It might also allow light sport aircraft to be equipped with floats.

2. We should revise the make/model endorsement requirements [SFAR 89, Section 65 and Section 125] for Sport Pilots and Sport Pilot Instructors. As written, the proposal would be an immense burden on the Sport Pilot Instructor to obtain the specific endorsements prior to making them. Both Sport Pilots and Sport Pilot Instructors should be able to make their own endorsements. Prior to making an endorsement, each Sport Pilot and Sport Pilot Instructor should learn about each make and model's characteristics prior to flying it. He should be familiar with the operating limitations (to include V speeds and emergency procedures) and weight and balance. Prior to carrying a passenger, or operating in class B or C airspace, the pilot should meet some currency standard in the specific aircraft. He should be proficient in slow flight, takeoffs and landings, and stalls in excess of the current category and class standards. Thus, an instructor endorsement would not be required as stated in the proposal.

3. The 36 month limitation on the use of converted trainers [FAR 21.191(i)(1)] should be extended by as much as four years. This would allow the manufacturing community time to produce new trainers, and permit flight schools enough time to amortize purchase expense. These converted trainers should be able to be used for compensation and hire for flight training purposes. At the end of the 36 month period (i.e. during the

R. Haulenbeek
1 of 2